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March 12, 2009

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW, Suite TW-A325 Washington, DC 20554

RE: Revised Annual 47 C.F.R § 64.2009(e) CPNI Certification

Dear Ms. Dortch;

On February 25, 2009 New Edge Network, Inc. filed a C.F.R. §64.2009(e) CPNI compliance certificate for the calendar year 2008 using the FCC ECFS system. Our filing confirmation number is 2009225949068. New Edge Network, Inc. is sending a revised filing to include additional detail and clarification. A revised CPNI Certification is attached including the original accompanying statement.

Respectfully submitted,

Pia C. Pieters

External Affairs Administrator

Pia C. Pietro

Fax: 360.693.9997

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

#### EB Docket 06-36

Annual 64.2009(E) CPNI Certification for year 2009

Date Filed: Revised March 12, 2009

Name of company(s) covered by this certification: New Edge Network, Inc.

Form 499 Filer ID: 820304

Name of signatory: Penny H. Bewick

Title of signatory: Vice President – External Affairs

I, Penny H. Bewick, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Sinch

# STATEMENT OF PROCEDURES ADOPTED BY NEW EDGE NETWORK, INC. d/b/a NEW EDGE NETWORKS

# TO ENSURE COMPLIANCE WITH THE FEDERAL COMMUNICATIONS COMMISSION RULES AND REGULATIONS PERTAINING TO THE PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

New Edge Network, Inc. d/b/a New Edge Networks (hereafter "the Company") has established operating procedures that ensure compliance with the Federal Communication Commission's ("Commission") rules and regulations regarding the protection of consumer proprietary network information ("CPNI") as stated in 47 CFR Ch. 1 § 64.2005.

The Company has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

The Company has implemented a process whereby it educates and trains its personnel, including sales agents, regarding the appropriate use of CPNI. Company has established disciplinary procedures should any of its personnel violate the CPNI procedures of the Company.

The Company has implemented a system whereby it maintains a record of its sales and marketing campaigns that use its customers' CPNI. Carrier has implemented a system whereby it maintains, for a minimum of one year, a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and/or services were offered as a part of the campaign.

The Company has established a supervisory review process regarding compliance with the CPNI rules and regulations with respect to outbound marketing situations and has implemented a system whereby it maintains records of carrier compliance for a minimum period of one year. Specifically, the Company has implemented a process whereby its sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding the use of its CPNI.